

REMARKS

Applicants thank the Examiner and her Supervisor for the courtesies extended at the personal interview conducted at the U.S. Patent and Trademark Office on January 21, 2004.

Claims 10-12 and 14-16 are all of the claims presently pending in this application. Claims 1-9 and 13 are hereby cancelled, and new claims 14-16 are added via this Amendment.

The invention according to the foregoing amended claims squarely addresses the problem in the conventional process caused by using the non-woven fabric sheet as a substrate (*see* the specification at page 2, lines 1-4).

In contrast, Goffetre neither mentions nor fairly suggests such a problem and, thus, also fails to provide a solution. Nowhere does Goffetre teach or suggest using a non-woven fabric sheet as the substrate in the film deposition process recited in claim 10. Furthermore, although WO '469 describes a non-woven fabric having a mass per unit area of 10-40 g/m², this non-woven fabric is entirely different in usage and effect from that of the present invention. Specifically, as described in the Abstract, WO '469 discloses a "screen to protect against sources of electromagnetic interference,"

which has nothing to do with the film deposition process of the instant claims. Absent the proscribed use of hindsight, and specifically not having the benefit of having read and understood the present application, an artisan of ordinary skill still would never have looked to this reference to solve the problems described in the instant application. The Examiner is respectfully reminded that the proper test for obviousness is not whether the references “could be” combined in the manner proposed, but rather whether there was some motivation or suggestion in the references themselves to make the combination. Here, such motivation or suggestion is completely lacking.

As to new dependent claim 14, Sando’s “pretreatment” electrodes are really just additional film depositors. In contrast, claim 14 recites pretreatment electrodes that clean the surfaces of the sheet prior to film deposition. None of the cited art teaches or suggests this feature and, thus, claim 14 is believed to be separately patentable.

Dependent claims 15 and 16 recite the use of the continuous sheet in greater detail, specifically as a lightweight rubber reinforcement sheet for reinforcing the side portions of a radial tire. None of the cited references teaches such a combination of features.

AMENDMENT UNDER 37 C.F.R. §1.111
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In view of the preceding amendments and remarks, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue that the Examiner feels may be best resolved through a personal or telephonic interview, she is kindly requested to contact the undersigned attorney at the local telephone number listed below.

A Petition for Extension of Time with appropriate fee accompanies this document. The USPTO is directed and authorized to charge all additional required fees (except the Issue Fee and/or the Publication Fee) to our Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



Steven M. Gruskin
Registration No. 36,818

SUGHRUE MION, PLLC

Telephone: (202) 293-7060

Facsimile : (202) 293-7860

WASHINGTON OFFICE

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